

**From:** Wortman, Eric [Wortman.Eric@epa.gov]  
**Sent:** 11/30/2021 7:21:46 PM  
**To:** Petriman, Viorica [Petriman.Viorica@epa.gov]; Kipka, Undine [kipka.undine@epa.gov]  
**CC:** Colecchia, Annamaria [Colecchia.Annamaria@epa.gov]  
**Subject:** RE: Engines on WT and OSS Emergency Engines?

## Ex. 5 Deliberative Process (DP)

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The

following discussion in the Fact Sheet might help address your question.

- EPA has determined BACT for NO<sub>x</sub>, NO<sub>2</sub> and PM<sub>2.5</sub> to be a combination of good combustion practices, reducing idling where possible, and the Tier 4 engine required in 40 C.F.R. part 1039 for the new diesel-powered electric generators on the WTGs and the OSS. For engines defined as emergency engines, the operation limitations shall be restricted as outlined in the NSPS and further limited to 200 hours per year. New emergency engines are to be certified to the emission standards in 40 C.F.R. part 89. Additionally, smoke and opacity limits from 310 CMR 7.06 apply to satisfy BACT for PM.

Additionally, emergency engines subject to 40 CFR Part 60 Subpart IIII must meet the operational limitations in Section 60.4211(f) which allows emergency engines to operate for up to 100 hours per calendar year for maintenance checks and readiness testing. Fifty of the 100 hours per calendar year may be used for non-emergency use. So, if the engine will be operated for more than 50 hours a year for non-emergency purposes during commissioning and construction, the engine would need to meet the non-emergency standards found in Section 60.4201.

Undine – please correct anything I missed.

Eric

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**From:** Petriman, Viorica <Petriman.Viorica@epa.gov>  
**Sent:** Tuesday, November 30, 2021 2:03 PM  
**To:** Kipka, Undine <kipka.undine@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>  
**Cc:** Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>  
**Subject:** Engines on WT and OSS Emergency Engines?

Hi Undine and Eric,

## Ex. 5 Deliberative Process (DP)

Thank you, Viorica

Viorica Petriman  
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